

Gary M. Hoffman (*Pro Hac Vice*)
Kenneth W. Brothers (*Pro Hac Vice*)
DICKSTEIN SHAPIRO MORIN
& OSHINSKY, LLP
2101 L Street, NW
Washington, DC 20037-1526
Phone (202) 785-9700
Fax (202) 887-0689

Edward A. Meilman (*Pro Hac Vice*)
DICKSTEIN SHAPIRO MORIN
& OSHINSKY, LLP
1177 Avenue of the Americas
New York, New York 10036-2714
Phone (212) 835-1400
Fax (212) 997-9880

Jeffrey B. Demain, State Bar No. 126715
Jonathan Weissglass, State Bar No. 185008
ALTSHULER, BERZON, NUSSBAUM, RUBIN & DEMAIN
177 Post Street, Suite 300
San Francisco, California 94108
Phone (415) 421-7151
Fax (415) 362-8064

Attorneys for Ricoh Company, Ltd.

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN FRANCISCO DIVISION

SYNOPSYS.,)
vs. Plaintiff,)
RICOH COMPANY, LTD.)
Defendant.)

1 Michael A. Weinstein declares as follows:

2 1. My name is Michael A. Weinstein, an attorney with the law firm of Dickstein, Shapiro,
 3 Morin & Oshinsky, LLP, counsel for Ricoh Company Limited. I am over the age of 21 and am
 4 competent to make this declaration. Based on my personal knowledge and information, I hereby declare
 5 to all the facts in this declaration.

6 2. In case C03-4669, a Stipulated Protect Order ("Order1") was entered into on June 3, 2003
 7 between the parties.

8 3. In case C03-2289, a Stipulated Protect Order ("Order2") was entered into on March 24,
 9 2004 between the parties.

10 4. On June 5, 2006, counsel for Synopsys/Aeroflex et al. filed with the court an Expedited
 11 Motion to Compel Access to Information Allegedly Covered by the Protective Order, or in the
 12 Alternative, to De-Designate Allegedly Confidential Information, and a declaration with exhibits in
 13 support of the Expedited Motion to Compel. The declaration refers to confidential documents (Exhibit 3,
 14 4, 5 and 6) which were produced during discovery.

15 5. Ricoh Company, Ltd. requests permission to file under seal the following exhibits which
 16 are designated confidential as defined in both Order1 and Order2.

17 a. Exhibits 3, 4, 5 and 6.

18 6. On June 5, 2006, counsel for Synopsys/Aeroflex et al. filed with the court
 19 "Administrative Motion for an Order Placing Documents Under Seal."

20 7. It is believed that the identified documents of 5a, *supra*, are privileged or protectable as a
 21 trade secret or otherwise entitled to protection.

22 8. As such, the above identified exhibits should be filed under seal pursuant to Order1 and
 23 Order2.

24 I declare under penalty of perjury under the laws of the United States of America that the
 25 foregoing is true and correct.

26 Signed at Washington, D.C. on June 15, 2006.

27 June 15, 2006

28 /s/ Michael A. Weinstein

Michael A. Weinstein

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**UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA**

RICOH COMPANY, LTD.,

Plaintiff.

VS

AEROFLEX ET AL.

Defendants

CASE NO. CV 03-4669 MJJ (EMC)
CASE NO. CV 03-2289 MJJ (EMC)

**[PROPOSED] ORDER GRANTING
MISCELLANEOUS ADMINISTRATIVE
REQUEST TO FILE CERTAIN
DOCUMENTS AND EXHIBITS UNDER
SEAL**

SYNOPSYS, INC.

Plaintiff

VS

RICOH COMPANY, LTD.

Defendants

1 Counsel for Synopsys/Aeroflex et al. on June 5, 2006 have filed an Administrative Motion for an
2 Order Placing Document Under Seal pursuant to Civil Local Rule 79-5(d), and requested permission to
3 file under seal the following Exhibits:

4 1. Exhibits 3, 4, 5 and 6.

5 Because the above documents include and refer to materials produced in discovery and
6 designated confidential by Ricoh Company, Ltd., this request was made pursuant to the Stipulated
7 Protective Order in this action.

8 The Court hereby GRANTS this request.

9 IT IS SO ORDERED.

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11 Dated: _____

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13 The Honorable Edward M. Chen
14 Magistrate Judge, United States District Court
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